



Proskauer Rose LLP Eleven Times Square New York, NY 10036-8299

## MEMORANDUM ENDORSED

December 16, 2024

### By ECF

The Honorable Gabriel W. Gorenstein  
U.S. District Court, Southern District of New York  
40 Foley Square  
New York, New York 10007

Elise M. Bloom  
Member of the Firm  
d +1.212.969.3410  
f 212.969.2900  
ebloom@proskauer.com  
www.proskauer.com

Re: **Ndugga v. Bloomberg L.P., Civil Action No. 20-cv-07464 (GHW) (GWG)**

Dear Judge Gorenstein:

We represent Bloomberg L.P. (“BLP”) in the above-referenced matter. Pursuant to Sections 1(E) and 2(B) of Your Honor’s Individual Practices, we write to request a brief extension of the deadline for BLP to submit a declaration explaining the need for sealing of documents filed in connection with Plaintiff’s anticipated motion for class certification from Monday, December 23, 2024, to Monday, December 30, 2024.

The deadline for Plaintiff’s anticipated motion for class certification is Friday, December 20, 2024. *See* Dkt. 324. Under the Amended Confidentiality Agreement and Protective Order entered in this case, BLP will have three days to file a declaration explaining the need for sealing of any documents designated as confidential submitted with Plaintiff’s motion, which will fall on Monday, December 23, 2024. *See* Dkt. 88 at ¶ 15.

Given the intervening weekend and upcoming holiday, BLP requests that this deadline be extended to **Monday, December 30, 2024**.

This is the first request for an extension of this deadline and Plaintiff consents to this request.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Elise M. Bloom

Elise M. Bloom

cc: All Counsel of Record (*via ECF*)

Application granted.

So Ordered.

GABRIEL W. CORENSTEIN  
United States Magistrate Judge

December 16, 2024